Case: 4:21-cr-00399-SRC Doc. #: 4 Filed: 07/14/21 Page: 1 of 3 PageID #: 10

FILED

JUL 1 4 2021

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

U.S. DISTRICT COURT EASTERN DISTRICT OF M ST. LOUIS	0

UNITED STATES OF AMERICA,	
Plaintiff,	4:21CR00399 SRC/JMB
v.) No.
DREW HAMILTON CLARK,	
Defendant.)

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and C. Ryan Finlen, Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

- 1. Defendant is charged with possession of a stolen firearm spanning between May 22, 2021 and May 26, 2021, as well as three counts of carjacking, each with companion Section 924(c) charges, all occurring on May 26, 2021.
- 2. The following information is taken from a multitude of St. Louis Metropolitan Police Department (SLMPD) incident reports: On May 22, 2021, Victim G. J. was unloading his vehicle at Union Station in St. Louis. After Victim G.J. turned the corner, Defendant drove off in his vehicle, taking his handgun in the process. On May 26, 2021, Victim S.R. was at his worksite when Defendant stole his truck and headed toward the exit. As Victim S.R. attempted to stop Defendant, Victim D.B. pulled his truck in front of the exit to block the escape. At that moment, Defendant became a carjacker by aiming a handgun at Victim D.B. and ordering him to move to allow Defendant's escape.

- 3. Within an hour, Defendant parked Victim S.R.'s truck behind Victim T.G.'s home in St. Louis. When Victim T.G. walked in, Defendant surprised her in her home by pointing a handgun at her and demanding money. When Victim T.G. could not provide Defendant any money, he took the keys to her car, zip-tied her hands in the bathroom, and drove off in her car. Video surveillance from local businesses and the Real Time Crime Center captured the Defendant's movements across the St. Louis area.
- 4. Less than three hours after leaving Victim T.G.'s home, Defendant encountered Victim M.A. as he crossed the parking lot at Victim M.A.'s place of employment. Defendant demanded Victim M.A.'s keys at gunpoint. Victim M.A. complied, and Defendant drove off in the third carjacked vehicle of the day. Within an hour, police spotted Defendant near where he abandoned Victim M.A.'s vehicle. A foot chase ensued.
- 5. Defendant ran through another victim's home before police catch him. Even after police catch him, Defendant continued to fight. Officers were only able to place Defendant into handcuffs after spraying him with OC spray and deploying tasers.
- 6. On his way to the hospital after his arrest, Defendant reached toward his pocket where he still had Victim G.J.'s stolen handgun. Officers were able to restrain Defendant before he was able to access the concealed firearm.

Case: 4:21-cr-00399-SRC Doc. #: 4 Filed: 07/14/21 Page: 3 of 3 PageID #: 12

7. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against Defendant, the Defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by Defendant's release warrant Defendant's detention pending trial.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial.

Respectfully submitted,

SAYLER A. FLEMING United States Attorney

s/C. Ryan Finlen

C. RYAN FINLEN, #6305918(IL) Assistant United States Attorney